

FILED CLERK, U.S. DISTRICT COURT		
1/31/2023		
CENTRAL DISTRICT OF CALIFORNIA		
BY:	VAV	DEPUTY

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8 UNITED STATES DISTRICT COURT

9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 March 2022 Grand Jury

11 UNITED STATES OF AMERICA,

EDCR 5:23-cr-00021-JGB

12 Plaintiff,

I N D I C T M E N T

13 v.

14 JASON EDWARD THOMAS CARDIFF,

[18 U.S.C. § 1029(a)(5): Access  
Device Fraud; 18 U.S.C.  
§ 1028A(a)(1): Aggravated Identity  
Theft; 18 U.S.C. § 1512(b)(2)(B):  
Witness Tampering; 18 U.S.C.  
§§ 982, 1029, 981, and 28 U.S.C.  
§ 2461(c): Criminal Forfeiture]

15 Defendant.

16  
17 The Grand Jury charges:

18 INTRODUCTORY ALLEGATIONS

19 1. At times relevant to this Indictment:

20 a. Redwood Scientific Technologies, Inc. ("Redwood"), was  
21 a Delaware corporation with its corporate headquarters located in  
22 Upland, California. Redwood sold various products to consumers,  
23 including thin film strips marketed as homeopathic remedies causing  
24 weight loss, male sexual enhancement, and smoking cessation.

25 b. Defendant JASON EDWARD THOMAS CARDIFF was a resident  
26 of Upland, California. Defendant CARDIFF served as Redwood's Chairman  
27 of the Board of Directors, Chief Executive Officer, and President.

1       2. These Introductory Allegations are incorporated into each  
2 count of this Indictment.  
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1 COUNT ONE

2 [18 U.S.C. §§ 1029(a)(5), 2]

3       3. Beginning on or about January 22, 2018, and continuing  
4 through in or about May 2018, in Riverside County, within the Central  
5 District of California, and elsewhere, defendant JASON EDWARD THOMAS  
6 CARDIFF and others known and unknown to the Grand Jury, aiding and  
7 abetting each other, with access devices (as defined in Title 18,  
8 United States Code, Section 1029(e)(1)) issued to other people,  
9 specifically, debit and credit card account numbers and expiration  
10 dates issued to Redwood customers, knowingly and with intent to  
11 defraud, effected and willfully caused to be effected transactions in  
12 and affecting interstate and foreign commerce, and by such conduct  
13 obtained things of value totaling at least \$1,000 during a one-year  
14 period.

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1 COUNT TWO

2 [18 U.S.C. §§ 1028A(a)(1), 2]

3 4. Beginning on or about January 22, 2018, and continuing  
4 through in or about May 2018, in Riverside County, within the Central  
5 District of California, and elsewhere, defendant JASON EDWARD THOMAS  
6 CARDIFF and others known and unknown to the Grand Jury, aiding and  
7 abetting each other, knowingly transferred, possessed, and used, and  
8 willfully caused to be transferred, possessed, and used, without  
9 lawful authority, the means of identification of another person, that  
10 is, names, credit card account numbers, and debit card account  
11 numbers, during and in relation to the commission of Access Device  
12 Fraud, a felony violation of Title 18, United States Code, Section  
13 1029(a)(5), as charged in Count One of this Indictment.

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1 COUNT THREE

2 [18 U.S.C. § 1512 (b) (2) (B) ]

3 5. Between in or about April 2018 and May 2018, in Riverside  
4 County, within the Central District of California, and elsewhere,  
5 defendant JASON EDWARD THOMAS CARDIFF knowingly and corruptly  
6 persuaded another person, namely, G.N., to cause and induce G.N. to  
7 alter, destroy, mutilate, and conceal an object, namely, e-mails and  
8 electronic records, with intent to impair the integrity and  
9 availability of the objects for use in official proceedings, namely,  
10 civil and administrative proceedings before the United States  
11 District Court for the Central District of California and the United  
12 States Federal Trade Commission.

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1 COUNT FOUR

2 [18 U.S.C. § 1512(b)(2)(B)]

3 6. Between in or about April 2018 and May 2018, in Riverside  
4 County, within the Central District of California, and elsewhere,  
5 defendant JASON EDWARD THOMAS CARDIFF knowingly and corruptly  
6 persuaded another person, namely, D.W., to cause and induce D.W. to  
7 alter, destroy, mutilate, and conceal an object, namely, e-mails and  
8 electronic records, with intent to impair the integrity and  
9 availability of the objects for use in official proceedings, namely,  
10 civil and administrative proceedings before the United States  
11 District Court for the Central District of California and the United  
12 States Federal Trade Commission.

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1 FORFEITURE ALLEGATION ONE

2 [18 U.S.C. §§ 982 and 1029]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States will seek  
5 forfeiture as part of any sentence, pursuant to Title 18, United  
6 States Code, Sections 982(a)(2) and 1029, in the event of the  
7 defendant's conviction of the offenses set forth in any of Counts One  
8 or Two of this Indictment.

9 2. The defendant, if so convicted, shall forfeit to the United  
10 States of America the following:

11 (a) All right, title, and interest in any and all  
12 property, real or personal, constituting, or derived from, any  
13 proceeds obtained, directly or indirectly, as a result of the  
14 offense;

15 (b) Any personal property used or intended to be used to  
16 commit the offense; and

17 (c) To the extent such property is not available for  
18 forfeiture, a sum of money equal to the total value of the property  
19 described in subparagraphs (a) and (b).

20 3. Pursuant to Title 21, United States Code, Section 853(p),  
21 as incorporated by Title 18, United States Code, Sections 982(b)(1)  
22 and 1029(c)(2), the defendant, if so convicted, shall forfeit  
23 substitute property, up to the total value of the property described  
24 in the preceding paragraph if, as the result of any act or omission  
25 of the defendant, the property described in the preceding paragraph,  
26 or any portion thereof: (a) cannot be located upon the exercise of  
27 due diligence; (b) has been transferred, sold to or deposited with a  
28 third party; (c) has been placed beyond the jurisdiction of the

1 court; (d) has been substantially diminished in value; or (e) has  
2 been commingled with other property that cannot be divided without  
3 difficulty.

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1 FORFEITURE ALLEGATION TWO

2 [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 981(a)(1)(C) and Title 28, United States  
7 Code, Section 2461(c), in the event of the defendant's conviction of  
8 the offenses set forth in any of Counts Three or Four of this  
9 Indictment.

10 2. The defendant, if so convicted, shall forfeit to the United  
11 States of America the following:

12 (a) All right, title and interest in any and all property,  
13 real or personal, constituting, or derived from, any proceeds  
14 traceable to any such offense; and

15 (b) To the extent such property is not available for  
16 forfeiture, a sum of money equal to the total value of the property  
17 described in subparagraph (a).

18 3. Pursuant to Title 21, United States Code, Section 853(p), as  
19 incorporated by Title 28, United States Code, Section 2461(c), the  
20 defendant shall forfeit substitute property, up to the total value of  
21 the property described in the preceding paragraph if, as the result  
22 of any act or omission of the defendant, the property described in  
23 the preceding paragraph, or any portion thereof: (a) cannot be  
24 located upon the exercise of due diligence; (b) has been transferred,  
25 sold to or deposited with a third party; (c) has been placed beyond  
26 the jurisdiction of the court; (d) has been substantially diminished

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1 in value; or (e) has been commingled with other property that cannot  
2 be divided without difficulty.

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